



DEPARTMENT OF HEALTH  
AND ENVIRONMENT

Mark Parkinson, Governor  
Roderick L. Bremby, Secretary

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June 2, 2010

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JUN 03 2010

Mr. Curt Michols  
Abbott Laboratories  
Dept. 0539, Bldg. AP52-S  
200 Abbott Park Road  
Abbott Park, IL 60064-6212

**RE: 2009 Annual Summary Leachate/Groundwater Monitoring Report  
Abbott Solid Waste Evaporative Lagoon, Wichita, Kansas  
EPA ID NO. KSD981495567**

Dear Mr. Michols:

The Kansas Department of Health and Environment (KDHE), Bureau of Waste Management (BWM) received the revised 2009 Annual Summary Leachate/Groundwater Monitoring Report (Annual Report) via email on May 21, 2010. The revisions to the Annual Report were due on May 19, 2010. In KDHE's April 19, 2010 letter, KDHE requested that all available arsenic data for a sampling event be used in the formulation of the arsenic isoconcentration maps as the maps submitted in the Annual Report show concentric circles surrounding MW-08 and MW-16. This would indicate that arsenic is only found in the groundwater surrounding the MW-08 and MW-16 clusters. However, this is not the case, as there were multiple detections in MW-01, MW-101S, MW-101I, MW-101D, MW 5S, and MW-5D.

KDHE is not satisfied with the response to comment number four as listed in Abbott's May 21, 2010 letter regarding the Annual Report. A text box does not accurately reflect the extent of the arsenic plume at the Abbott facility and KDHE again requests the isoconcentration maps for arsenic be revised to include all arsenic concentrations for a sampling event, regardless of whether the wells in question were sampled in accordance to the Post-Closure Plan or the Environmental Protection Agency's Administrative Order of Consent (AOC). Transparency to the public is a crucial element in the Annual Report and KDHE must be prudent in maintaining this transparency. The isoconcentration maps as submitted are insufficient and new maps must be submitted to KDHE by June 16, 2010.



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